

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v - :

NOTICE OF MOTION

OUMAR ISSA , :

09 CR 1244 (RJH)

Defendant. :


- - - - - X

PLEASE TAKE NOTICE, that upon the annexed declarations of Oumar Issa and Steven M. Statsinger, Esq., and the accompanying Memorandum of Law, the undersigned will move this Court, before the Honorable Richard J. Holwell, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a time to be designated by the Court, for an order, pursuant to Rules 12 and 41 of the Federal Rules of Criminal Procedure, (1) dismissing the Indictment, (2) suppressing statements obtained in violation of Miranda v. Arizona, and (3) granting Mr. Issa permission to join in his co-defendants' motions or, in the alternative, conducting an evidentiary hearing, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
December 17, 2010

Respectfully submitted,

LEONARD F. JOY, ESQ.
Federal Defenders of New York, Inc.

By: 
STEVEN M. STATSINGER, ESQ.
Attorney for Defendant
OUMAR ISSA
52 Duane Street - 10th Floor
New York, New York 10007
Tel.: (212) 417-8736

TO:

PREET BHARARA, ESQ.

United States Attorney

Southern District of New York

One St. Andrew's Plaza

New York, New York 10007

Attn: Jeffrey Brown, Esq.

Christian Everdell, Esq.

Assistant United States Attorneys